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INDUSTRIAL

Subject:

Georgia-Pacific Corporation Time Critical Removal Action Monthly Progress Report  
#3

Date:

23 February 2007

Dear Mr. Chummar:

Contact:

Patrick N. McGuire

Attached is the third monthly progress report for the Time Critical Removal Action (TCRA) at the Georgia-Pacific Corporation (Georgia-Pacific) Kalamazoo Mill Property and the former Hawthorne Mill Property (collectively referred to as the Mill Properties). The Mill Properties are associated with the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. This report has been prepared pursuant to the Administrative Settlement Agreement and Order on Consent (AOC), Docket No. V-W-'07-C-858, and covers activities from January 13, 2007 through February 9, 2007.

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Sincerely,

ARCADIS of New York, Inc.

Patrick N. McGuire  
Associate

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**I. Significant Developments****Actions Performed**

- Removal activities at the Oxbow Area are nearly complete, a small quantity remains at the excavator turn-around pad. To date a total of 14,716 cubic yards (cy) of soil/residuals have been removed from the Oxbow Area and consolidated at A-Site.
- Excavation activities continued at the Refuse Area, to date a total of 22,616 cy of soil/residuals have been removed; approximately 200 cy of soil/residuals were transported to an offsite disposal facility and the remaining soil/residuals were consolidated at A-Site.
- Additional trees and root structures were removed from the Michigan Department of Transportation (MDOT) right-of-way.
- During the previous reporting period treated water samples were collected on January 3, 10 and 11 and submitted to Severn Trent Laboratories (STL) for polychlorinated biphenyl (PCB) and total suspended solids (TSS) analyses. The analytical data indicated PCBs and TSS met discharge requirements.
- On January 15, discharged 18,208 gallons of treated water into Davis Creek after notifying the United States Environmental Protection Agency (USEPA).
- On January 16, collected a sample of ponded water in the Oxbow Area for characterization, sent the sample to STL for PCB analysis and Target Compound List/Target Analyte List (TCL/TAL) constituent analysis.
- On January 17, additional drums were discovered at the Refuse Area, which were subsequently placed in overpacks for future characterization and disposal at an appropriate facility.
- On January 19, 23, 24, 25, and 26 conducted turbidity monitoring in the Kalamazoo River with water samples collected (one upstream and one downstream each day) and sent to STL for PCB analysis.
- On January 15, 19, 25, and 29, and February 5 treated water samples were collected and sent to STL for PCB and TSS analyses.
- On January 23 and 26, and February 6, 7, and 8 verification soil samples were collected from the Refuse and Oxbow Areas and sent to STL for PCB analysis, with 20 percent of the verification samples selected for TCL/TAL analyses.
- On January 24, collected a sample of ponded water in the Refuse Area and sent to STL for PCB, TCL/TAL constituent and TSS analyses.
- On January 25, a soil sample was collected from the Transformer Pad Area and sent to STL for waste characterization analyses (i.e., Toxicity Characteristic Leaching Procedure [TCLP] analyses for VOCs, SVOCs, metals, pesticides; and Resource Conservation and Recovery Act (RCRA) hazardous characteristic analyses).

- On January 29, began backfilling the Oxbow Area with Class II sand.
- On February 2, USEPA provided an approved vegetation list for site restoration.
- On February 5, Terra Contracting L.L.C. (Terra) surveyed the Kalamazoo River depth at the Refuse Area in preparation for silt curtain installation.
- On February 5, began backfilling the Refuse Area with Class II sand.
- On February 7, discharged 10,500 gallons of treated water into Davis Creek after receiving the analytical data indicating PCBs and TSS met discharge requirements.
- On February 7, the Refuse Area south of former Mill Lagoon #5 was backfilled.
- On February 6 and 7, verification soil samples were collected from the Refuse and Oxbow Areas. The samples were submitted to STL for PCB analysis, with 20 percent of the verification samples selected for TCL/TAL analyses.
- Created a clean truck route (comprised of sand) to the Refuse Area and Oxbow Area for placement of sand backfill in those areas and to facilitate removal of the berm at the Refuse Area.
- Continued air and dust monitoring programs, in accordance with the *Time Critical Removal Action Work Plan for the Refuse Area at the Georgia-Pacific Corporation Kalamazoo Mill Property and the Oxbow Area at the Former Hawthorne Mill Property* (TCRA Work Plan).
- Continued consolidation and grading activities at A-Site; due to wet conditions Class II sand was used for stabilization.
- Conducted air sampling using a photoionization detector in response to an observed smell at the Refuse Area, results were below action levels.
- Monitored weather conditions daily to anticipate potential inclement weather.

#### **Problems Encountered**

- On February 1 a layer of residual was found that extended past the fence line north of the pump station. The fence post and chain link fence were removed and soil/residual was excavated one bucket width to the depth of the visible layer at the exposed side. The layer of residuals was found to extend the west into the electrical pole area north of the lift station.
- Ice on the Kalamazoo River created a potentially unsafe situation for conducting turbidity monitoring; therefore turbidity monitoring was not conducted between February 6 and February 9. However, prior to February 6 turbidity monitoring was conducted in accordance with the TCRA Work Plan.

**Analytical Data Received**

- Analytical data for the air samples collected during the previous reporting period (taken three times daily, in accordance with the TCRA Work Plan) are presented in Table 1. All results are below the criteria set forth in the TCRA Work Plan. The air samples submitted for analysis during this reporting period, for which there are currently no validated data, are also identified in Table 1.
- Analytical data for the verification soil samples collected during the previous reporting period are presented in Table 2. PCBs were either not detected or below 1 milligram/kilogram (mg/kg) in the 31 samples submitted. The verification soil samples submitted for analysis during this reporting period, for which there are currently no validated data, are also identified in Table 2.
- Table 3 summarizes the analytical data for the treated water samples collected during the previous reporting period. The treated water samples submitted for analysis during this reporting period, for which there are currently no validated data, are also identified in Table 3.
- Analytical data for other samples (e.g., soil waste characterization samples and water characterization samples) collected during the previous reporting period are presented in Table 4. The other samples collected and submitted for analysis during this reporting period, for which there are currently no validated data, are also identified in Table 4.

**II. *Developments Anticipated*****Schedule of Actions to be Performed**

- Continue backfill activities in the Oxbow and Refuse Areas.
- Begin removal of excavator turn-around pad in the Oxbow Area.
- Continue air and dust monitoring programs.
- Begin turbidity curtain installation and berm removal at the Refuse Area.
- Continue turbidity monitoring of the Kalamazoo River.
- Decontamination and relocation of inactive equipment from A-Site to the Oxbow and Refuse Areas to assist in excavation and backfill activities.

**Anticipated Problems**

- Potential for ice flow in the Kalamazoo River to damage silt curtain.

**Planned Resolutions of Past or Anticipated Problems**

- Elevation of the ponded water in the Oxbow Area naturally decreased overtime and removal/treatment of the water was not necessary.

- The residual layer found extending into the electrical pole area north of the lift station will be assessed with the USEPA during the next reporting period.
- As the ice breaks up on the Kalamazoo River the turbidity monitoring will resume. However, if ice is still present at the time river bank excavation activities begin, turbidity monitoring safety will be assessed and safe methods followed.

Tables

**Table 1. Air Monitoring Sample Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**

Sample ID	Sample Location	Sample Date	PCB Concentration (µg/m <sup>3</sup> )
G53080	AST-PUF-PRE	11/16/06	0.0024
G53081	HWY-PUF-PRE	11/16/06	0.0117
G53082	AST-PUF-001	11/28/06	0.0045
G53083	HWY-PUF-001	11/28/06	0.0012
G53084	BKG-PUF-001	11/28/06	0.0009
G53085	AST-PUF-002	11/29/06	0.0025
G53086	HWY-PUF-002	11/29/06	0.0061
G53087	BKG-PUF-002	11/29/06	0.0035
G53088	AST-PUF-003	11/30/06	0.0023
G53089	HWY-PUF-003	11/30/06	0.0092
G53090	BKG-PUF-003	11/30/06	0.0034
G53091	AST-PUF-004	12/1/06	0.0005
G53092	HWY-PUF-004	12/1/06	0.0022
G53093	BKG-PUF-004	12/1/06	0.0004
G53094	AST-PUF-005	12/2/06	0.0008
G53095	HWY-PUF-005	12/2/06	0.0011
G53096	BKG-PUF-005	12/2/06	0.0004
G53097	AST-PUF-006	12/5/06	0.0005
G53098	HWY-PUF-006	12/5/06	0.0008 J
G53099	BKG-PUF-006	12/5/06	0.0009
G53100	AST-PUF-007	12/6/06	0.0004
G53101	HWY-PUF-007	12/6/06	0.0017
G53102	BKG-PUF-007	12/6/06	0.0008
G53103	AST-PUF-008	12/7/06	0.0005
G53104	HWY-PUF-008	12/7/06	0.0018
G53105	BKG-PUF-008	12/7/06	0.0005
G53106	AST-PUF-009	12/8/06	0.0003
G53107	HWY-PUF-009	12/8/06	0.0012 J
G53108	BKG-PUF-009	12/8/06	ND
G53109	AST-PUF-010	12/9/06	ND
G53110	HWY-PUF-010	12/9/06	0.0012 J
G53111	BKG-PUF-010	12/9/06	ND
G53018	BKG-PUF	12/12/06	0.0008
G53019	HWY-PUF	12/12/06	0.0027
G53020	AST-PUF	12/12/06	0.0015
G53030	BKG-PUF	12/13/06	ND
G53031	HWY-PUF	12/13/06	0.0015
G53032	AST-PUF	12/13/06	0.0033
G53033	HWY-PUF	12/14/06	0.0026
G53034	AST-PUF	12/14/06	0.0008
G53035	BKG-PUF	12/14/06	0.0017
G53036	HWY-PUF	12/15/06	0.0029
G53037	AST-PUF	12/15/06	0.0013
G53038	BKG-PUF	12/16/06	0.0006
G53039	HWY-PUF	12/16/06	0.0027
G53040	AST-PUF	12/16/06	0.0015 J

**Table 1. Air Monitoring Sample Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**

Sample ID	Sample Location	Sample Date	PCB Concentration (µg/m <sup>3</sup> )
G53041	BKG-PUF	12/19/06	0.0005
G53042	HWY-PUF	12/19/06	0.0019
G53043	AST-PUF	12/19/06	0.0007
G53044	BKG-PUF	12/20/06	ND
G53045	HWY-PUF	12/20/06	0.0020
G53046	AST-PUF	12/20/06	ND J
G53067	BKG-PUF	12/21/06	0.0027
G53068	HWY-PUF	12/21/06	0.0020
G53072	BKG-PUF	12/22/06	0.0005
G53073	HWY-PUF	12/22/06	0.0026
G53074	BKG-PUF	12/28/06	0.0009 J
G53075	HWY-PUF	12/28/06	0.0017
G53077	BKG-PUF	12/29/06	0.0007
G53078	HWY-PUF	12/29/06	0.0022
G53079	AST-PUF	12/29/06	0.0011 J
G53112	BKG-PUF	12/30/06	0.0004 J
G53113	HWY-PUF	12/30/06	0.0020
G53114	AST-PUF	12/30/06	0.0004 J
G53117	BKG-PUF	1/4/07	0.0010 JN
G53118	HWY-PUF	1/4/07	0.0008 JN
G53119	AST-PUF	1/4/07	ND
G53120	BKG-PUF	1/5/07	0.0012 JN
G53121	HWY-PUF	1/5/07	0.0011 J
G53122	AST-PUF	1/5/07	0.0007 J
G53125	BKG-PUF	1/6/07	0.0030 J
G53126	HWY-PUF	1/6/07	0.0035 J
G53127	AST-PUF	1/6/07	0.0017 J
G53128	BKG-PUF	1/9/07	ND
G53129	HWY-PUF	1/9/07	0.0014
G53130	AST-PUF	1/9/07	ND
G53139	BKG-PUF	1/10/07	ND
G53140	HWY-PUF	1/10/07	0.0015
G53141	AST-PUF	1/10/07	0.0006
G53147	BKG-PUF	1/11/07	0.0010 J
G53148	HWY-PUF	1/11/07	0.0013
G53149	AST-PUF	1/11/07	ND
G53151	HWY-PUF	1/13/07	–
G53152	BKG-PUF	1/13/07	–
G53153	AST-PUF	1/13/07	–
G53156	BKG-PUF	1/17/07	–
G53157	HWY-PUF	1/17/07	–
G53158	AST-PUF	1/17/07	–
G53159	BKG-PUF	1/18/07	–
G53160	HWY-PUF	1/18/07	–
G53161	AST-PUF	1/18/07	–
G53167	BKG-PUF	1/19/07	–

**Table 1. Air Monitoring Sample Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**

Sample ID	Sample Location	Sample Date	PCB Concentration (µg/m <sup>3</sup> )
G53168	HWY-PUF	1/19/07	–
G53169	AST-PUF	1/19/07	–
G53170	BKG-PUF	1/23/07	–
G53171	HWY-PUF	1/23/07	–
G53172	AST-PUF	1/23/07	–
G53180	BKG-PUF	1/24/07	–
G53181	HWY-PUF	1/24/07	–
G53182	AST-PUF	1/24/07	–
G53187	HWY-PUF	1/25/07	–
G53188	AST-PUF	1/25/07	–
G53191	BKG-PUF	1/25/07	–
G53196	BKG-PUF	1/29/07	–
G53197	HWY-PUF	1/29/07	–
G53198	AST-PUF	1/29/07	–
G53200	BKG-PUF	1/30/07	–
G53201	AST-PUF	1/30/07	–
G53202	BKG-PUF	2/1/07	–
G53203	AST-PUF	2/1/07	–
G53204	BKG-PUF	2/2/07	–
G53205	AST-PUF	2/2/07	–
G53208	BKG-PUF	2/4/07	–
G53206	AST-PUF	2/5/07	–
G53219	AST-PUF	2/7/07	–
G53220	AST-PUF	2/8/07	–
G53223	AST-PUF	2/9/07	–

Notes:

- = These samples were submitted for analysis this reporting period. This data will be presented in the next monthly progress report after the validation process has been completed.
- ND = Analyte was not detected.
- J = The compound was positively identified; however, the associated numerical value is an estimated concentration only.
- JN = The analysis indicates the presence of a compound for which there is presumptive evidence to make a tentative identification. The associated numerical value is an estimated concentration only.

**Table 2. Verification Soil Sample Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**

Sample ID	Sample Location	Sample Date	PCB Concentration (µg/Kg)
G53021	Oxbow 142	12/12/06	ND
G53022	Oxbow 104	12/12/06	ND
G53023	Oxbow 105	12/12/06	ND
G53024	Oxbow 83	12/12/06	ND
G53025	Oxbow 84	12/12/06	ND
G53026	Oxbow 86	12/12/06	ND
G53027	Oxbow 68	12/12/06	ND
G53028	Oxbow 47	12/12/06	ND
G53029	Oxbow 47 DUP	12/12/06	ND
G53047	Oxbow 44	12/20/06	ND
G53048	Oxbow 12	12/20/06	ND
G53049	Oxbow 10	12/20/06	ND
G53050	Oxbow 26	12/20/06	ND
G53051	Oxbow 59	12/20/06	ND
G53052	Oxbow 8	12/20/06	ND
G53053	Oxbow 6	12/20/06	ND
G53054	Oxbow 22	12/20/06	ND
G53055	Oxbow 21	12/20/06	ND
G53056	Oxbow 21 DUP	12/20/06	ND
G53057	Oxbow 37	12/20/06	ND
G53058	Oxbow 35 MS/MSD	12/20/06	ND
G53059	Oxbow 54	12/20/06	ND
G53060	Oxbow 52	12/20/06	ND
G53061	Oxbow 18	12/20/06	ND
G53062	Oxbow 17	12/20/06	ND
G53063	Oxbow 1	12/20/06	ND
G53064	Oxbow 2	12/20/06	ND
G53065	Oxbow 2 DUP	12/20/06	ND
G53066	Oxbow 3	12/20/06	ND
G53069	Oxbow 45	12/21/06	ND
G53070	Oxbow 156	12/21/06	ND
G53071	Oxbow 173	12/21/06	ND
G53131	Oxbow 95	1/9/07	143
G53132	Oxbow 95 DUP	1/9/07	179
G53133	Oxbow 94	1/9/07	ND
G53134	Oxbow 75 MSDS	1/9/07	ND
G53135	Oxbow 96	1/9/07	ND
G53136	Oxbow 98	1/9/07	ND
G53137	Oxbow 157	1/9/07	ND
G53138	Oxbow 158	1/9/07	ND
G53142	Oxbow 144	1/10/07	ND
G53143	Oxbow 89	1/10/07	ND
G53144	Oxbow 162	1/10/07	243
G53175	Refuse 39	1/23/07	-
G53176	Refuse 33	1/23/07	-
G53177	Refuse 33 DUP	1/23/07	-

**Table 2. Verification Soil Sample Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**

Sample ID	Sample Location	Sample Date	PCB Concentration (µg/Kg)
G53178	Refuse 27	1/23/07	–
G53179	Refuse 20	1/23/07	–
G53195	Oxbow 133	1/26/07	–
G53209	Refuse 12 MSDS	2/6/07	–
G53210	Refuse 5	2/6/07	–
G53211	Refuse SW 53	2/6/07	–
G53212	Refuse SW 60 DUP	2/6/07	–
G53213	Refuse 60	2/6/07	–
G53214	Refuse Discrete Verification Sample	2/7/07	–
G53215	Oxbow Discrete Verification Sample	2/7/07	–
G53216	Oxbow 185	2/7/07	–
G53217	Oxbow 185 DUP	2/7/07	–
G53218	Oxbow 186	2/7/07	–
G53221	Refuse SW 51	2/8/07	–
G53222	Oxbow 160	2/8/07	–

Notes:

- = These samples were submitted for analyses this reporting period. This data will be presented in the next monthly progress report after the validation process has been completed.
- ND = Analyte was not detected.

**Table 3. Treated Water Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**

Sample ID	Sample Location	Sample Date	PCB Concentration (µg/l)
G53115	Treated Water Sample #1	1/3/07	0.222 J
G53146	Treated Water Sample #2	1/10/07	ND
G53150	Treated Water Sample #3	1/11/07	ND
G53154	Treated Water Sample #4	1/15/07	–
G53162	Water Treatment System Carbon Tank A	1/19/07	–
G53163	Water Treatment System Carbon Tank D	1/19/07	–
G53164	Treated Water Sample #5a	1/19/07	–
G53186	Treated Water Sample #5b	1/25/07	–
G53199	Treated Water Sample #6	1/29/07	–
G53207	Treated Water Sample #7	2/5/07	–

Notes:

- = These samples were submitted for analysis this reporting period. This data will be presented in the next monthly progress report after the validation process has been completed.
- ND = Analyte was not detected.
- J = The compound was positively identified; however, the associated numerical value is an estimated concentration only.

**Table 4. Other Sampling Results, Time Critical Removal Action –  
Kalamazoo Mill and Former Hawthorne Mill Properties, Allied  
Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**

Constituent	Sample ID			
	Soil Waste Characterization Samples			
	G53076 Drum Refuse 12/28/06	G53123 Refuse Area 1/5/07	G53124 Transformer Area 1/5/07	G53192 Transformer Area 1/25/07
Polychlorinated Biphenyls	0.063	NA	8.5	—
Vinyl Chloride	ND	ND	NA	—
1,1-Dichloroethene	ND	ND	NA	—
2-Butanone	ND	ND	NA	—
Chloroform	ND	ND	NA	—
Carbon Tetrachloride	ND	ND	NA	—
Benzene	ND	ND	NA	—
1,2-Dichloroethane	ND	ND	NA	—
Trichloroethene	ND	ND	NA	—
Tetrachloroethene	ND	ND	NA	—
Chlorobenzene	ND	ND	NA	—
Pyridine	ND	ND	NA	—
1,4-Dichlorobenzene	ND	ND	NA	—
2-Methylphenol	ND	ND	NA	—
4-Methylphenol	ND	ND	NA	—
Hexachloroethane	ND	ND	NA	—
Nitrobenzene	ND	ND	NA	—
Hexachlorobutadiene	ND	ND	NA	—
2,4,6-Trichlorophenol	ND	ND	NA	—
2,4,5-Trichlorophenol	ND	ND	NA	—
2,4-Dinitrotoluene	ND	ND	NA	—
Hexachlorobenzene	ND	ND	NA	—
Pentachlorophenol	ND	ND	NA	—
Arsenic	0.008 B	ND	NA	—
Barium	1.990	1	NA	—
Cadmium	0.014 J	0.011	NA	—
Chromium	0.060	0.006	NA	—
Lead	0.093	0.039	NA	—
Mercury	ND	ND	NA	—
Selenium	ND	ND	NA	—
Silver	ND	ND	NA	—
Ignitability (°F)	>200	>200	NA	—
Corrosivity (pH)	8.1	7.5	NA	—
Reactivity	ND <sup>1</sup>	ND <sup>1</sup>	NA	—
Total Suspended Solids	NA	NA	NA	NA

**Table 4. Other Sampling Results, Time Critical Removal Action –  
Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper,  
Inc./Portage Creek/Kalamazoo River Superfund Site**

Constituent	Sample ID							
	Water Characterization Samples							
	G53145 Oxbow 1/10/07	G53155 Oxbow 1/16/07	G53165 River Upstream 1/19/07	G53166 River Downstream 1/19/07	G53173 River Upstream 1/23/07	G53174 River Downstream 1/23/07	G53183 River Upstream 1/24/07	G53184 Refuse 1/24/07
Polychlorinated Biphenyls	ND	—	—	—	—	—	—	—
Vinyl Chloride	NA	—	NA	NA	NA	NA	NA	—
1,1-Dichloroethene	NA	—	NA	NA	NA	NA	NA	—
2-Butanone	NA	—	NA	NA	NA	NA	NA	—
Chloroform	NA	—	NA	NA	NA	NA	NA	—
Carbon Tetrachloride	NA	—	NA	NA	NA	NA	NA	—
Benzene	NA	—	NA	NA	NA	NA	NA	—
1,2-Dichloroethane	NA	—	NA	NA	NA	NA	NA	—
Trichloroethene	NA	—	NA	NA	NA	NA	NA	—
Tetrachloroethene	NA	—	NA	NA	NA	NA	NA	—
Chlorobenzene	NA	—	NA	NA	NA	NA	NA	—
Pyridine	NA	—	NA	NA	NA	NA	NA	—
1,4-Dichlorobenzene	NA	—	NA	NA	NA	NA	NA	—
2-Methylphenol	NA	—	NA	NA	NA	NA	NA	—
4-Methylphenol	NA	—	NA	NA	NA	NA	NA	—
Hexachloroethane	NA	—	NA	NA	NA	NA	NA	—
Nitrobenzene	NA	—	NA	NA	NA	NA	NA	—
Hexachlorobutadiene	NA	—	NA	NA	NA	NA	NA	—
2,4,6-Trichlorophenol	NA	—	NA	NA	NA	NA	NA	—
2,4,5-Trichlorophenol	NA	—	NA	NA	NA	NA	NA	—
2,4-Dinitrotoluene	NA	—	NA	NA	NA	NA	NA	—
Hexachlorobenzene	NA	—	NA	NA	NA	NA	NA	—
Pentachlorophenol	NA	—	NA	NA	NA	NA	NA	—
Arsenic	NA	—	NA	NA	NA	NA	NA	—
Barium	NA	—	NA	NA	NA	NA	NA	—
Cadmium	NA	—	NA	NA	NA	NA	NA	—
Chromium	NA	—	NA	NA	NA	NA	NA	—
Lead	NA	—	NA	NA	NA	NA	NA	—
Mercury	NA	—	NA	NA	NA	NA	NA	—
Selenium	NA	—	NA	NA	NA	NA	NA	—
Silver	NA	—	NA	NA	NA	NA	NA	—
Ignitability (°F)	NA	—	NA	NA	NA	NA	NA	—
Corrosivity (pH)	NA	—	NA	NA	NA	NA	NA	—
Reactivity	NA	—	NA	NA	NA	NA	NA	—
Total Suspended Solids	11	—	NA	NA	NA	NA	NA	—

**Table 4. Other Sampling Results, Time Critical Removal Action –  
Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper,  
Inc./Portage Creek/Kalamazoo River Superfund Site**

Constituent	Sample ID				
	Water Characterization Samples				
	G53185 River Downstream 1/24/07	G53189 River Upstream 1/25/07	G53190 River Downstream 1/25/07	G53193 River Upstream 1/26/07	G53194 River Downstream 1/26/07
Polychlorinated Biphenyls	—	—	—	—	—
Vinyl Chloride	NA	NA	NA	NA	NA
1,1-Dichloroethene	NA	NA	NA	NA	NA
2-Butanone	NA	NA	NA	NA	NA
Chloroform	NA	NA	NA	NA	NA
Carbon Tetrachloride	NA	NA	NA	NA	NA
Benzene	NA	NA	NA	NA	NA
1,2-Dichloroethane	NA	NA	NA	NA	NA
Trichloroethene	NA	NA	NA	NA	NA
Tetrachloroethene	NA	NA	NA	NA	NA
Chlorobenzene	NA	NA	NA	NA	NA
Pyridine	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	NA	NA	NA	NA	NA
2-Methylphenol	NA	NA	NA	NA	NA
4-Methylphenol	NA	NA	NA	NA	NA
Hexachloroethane	NA	NA	NA	NA	NA
Nitrobenzene	NA	NA	NA	NA	NA
Hexachlorobutadiene	NA	NA	NA	NA	NA
2,4,6-Trichlorophenol	NA	NA	NA	NA	NA
2,4,5-Trichlorophenol	NA	NA	NA	NA	NA
2,4-Dinitrotoluene	NA	NA	NA	NA	NA
Hexachlorobenzene	NA	NA	NA	NA	NA
Pentachlorophenol	NA	NA	NA	NA	NA
Arsenic	NA	NA	NA	NA	NA
Barium	NA	NA	NA	NA	NA
Cadmium	NA	NA	NA	NA	NA
Chromium	NA	NA	NA	NA	NA
Lead	NA	NA	NA	NA	NA
Mercury	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA
Ignitability (°F)	NA	NA	NA	NA	NA
Corrosivity (pH)	NA	NA	NA	NA	NA
Reactivity	NA	NA	NA	NA	NA
Total Suspended Solids	NA	NA	NA	NA	NA

**Notes:**

Concentrations are in parts per million (ppm) unless otherwise noted.

<sup>1</sup>The characteristic of reactivity is determined by measuring the release of cyanide or sulfide from the waste, both of which were not detected in the sample.

— = These samples were submitted for analysis this reporting period. This data will be presented in the next monthly progress report after the validation process has been completed.

ND = Analyte was not detected.

NA = Compound was not analyzed for.

B = The compound has been found in the samples as well as its associated blank, its presence in the sample may be suspect.

J = The compound was positively identified; however, the associated numerical value is an estimated concentration only.